

1 CURTIS R. TINGLEY (SBN 112322)
ctingley@tingleyllp.com
2 BRUCE C. PIONTKOWSKI (SBN 152202)
bpiontkowski@tingley.com
3 TINGLEY PIONTKOWSKI LLP
10 Almaden Blvd, Suite 430
4 San Jose, California 95113
Telephone: (408) 283-7000
5 Facsimile: (408) 283-7000

6 Attorneys for Defendants
JOHN BARGETTO and
7 BARGETTO'S SANTA CRUZ WINERY

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11
12 MARILYN CHURCHILL, an individual,

13 Plaintiff,

14 v.

15 JOHN BARGETTO, in his individual and
official capacities; BARGETTO'S SANTA
16 CRUZ WINERY, a California Corporation;
and DOES 1 through 100, inclusive,

17 Defendants.
18

CASE NO. C07-03007 MMC

**STIPULATION TO CONTINUE
DISCOVERY DEADLINES**

Honorable Maxine M. Chesney

19 Counsel for Plaintiff MARILYN CHURCHILL and Defendants JOHN BARGETTO and
20 BARGETTO'S SANTA CRUZ WINERY (hereinafter collectively referred to as the "Parties")
21 hereby STIPULATE as follows:

22 1. There is currently pending discovery that must be completed prior to a meaningful
23 mediation;

24 2. Due to various reasons including, but not limited to, the change of law firms
25 representing defendants, and the passing of the father of plaintiff's counsel, the discovery has not
26 been completed;

27 3. The current deadlines for discovery will not allow for the completion of the
28 necessary discovery;

1 4. Counsel agree that the following deadlines are continued thirty days:

- 2 a. Non-expert discovery cut-off from March 28, 2008 to April 28,
3 2008;
4 b. Designation of experts from April 18, 2008 to May 18, 2008;
5 c. Designation of rebuttal experts from May 2, 2008 to June 2, 2008;
6 d. Expert discovery cut-off from May 23, 2008 to June 23, 2008;
7 e. Dispositive motion cut-off from June 6, 2008 to July 6, 2008.

8 IT IS SO STIPULATED.

9 Dated: February 29, 2008

THE MORALES LAW FIRM

11 By: /s/ David Morales

12 DAVID MORALES
Attorneys for Plaintiff

14 Dated: February 29, 2008

TINGLEY PIONTKOWSKI LLP

15 /s/ Bruce C. Piontkowski

16 BRUCE C. PIONTKOWSKI
Attorneys for Defendants

20 GOOD CAUSE APPEARING, it is hereby ordered that the above-identified deadlines
21 for discovery are hereby continued 30 days.

22 IT IS SO ORDERED.

23 Dated: February __, 2008

24 Honorable Maxine M. Chesney
25 JUDGE OF THE U.S. DISTRICT COURT
26
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28

1 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
2 “conformed” signature (/s/) within this efiled document.

3
4 Dated: February 29, 2008

TINGLEY PIONTKOWSKI LLP

5 By: /s/ Bruce C. Piontkowski
6 BRUCE C. PIONTKOWSKI
7 Attorneys for Defendants
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